

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**ALTPASS LLC,**

Plaintiff,

v.

**ONEPLUS TECHNOLOGY  
(SHENZHEN) CO., LTD.**

Defendant.

**Civil Action No. 2:20-cv-0105**

**JURY TRIAL DEMANDED**

**STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE**

Pursuant to Fed. R. Civ. P. 41(a)(2) and (c), The Plaintiff Altpass, LLC (“Plaintiff”) and the Defendant OnePlus Technology (Shenzhen) Co., Ltd., (“Defendant”), hereby move for an order dismissing all claims in this action WITH prejudice subject to the terms of the agreement between the parties and dated December 25, 2020, with each party to bear its own costs, expenses, and attorneys’ fees.

DATED January 20, 2021.

Respectfully submitted,

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ATTORNEY TO BE NOTICED

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of January, 2021, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. A true and complete copy of the foregoing document has been served upon all counsel of record.

/s/ Neal Massand

Neal Massand